

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE**

| | | |
|---------------------------------------|---|-----------------------|
| IN THE MATTER OF THE APPLICATION |) | |
| OF DELMARVA POWER & LIGHT COMPANY, |) | |
| EXELON CORORPATION, PEPCO HOLDINGS |) | PSC DOCKET NO. 14-193 |
| INC., PURPLE ACQUISITION CORPORATION, |) | |
| EXELON ENERGY DELIVERY COMPANY, LLC |) | |
| AND SPECIAL PURPOSE ENTITY, LLC |) | |
| FOR APPROVALS UNDER THE PROVISIONS |) | |
| OF 26 <i>Del. C.</i> §§ 215 AND 1016 |) | |
| (FILED JUNE 18, 2014) |) | |

**INTERVENOR JEREMY FIRESTONE'S RESPONSE TO STAFF'S REQUEST TO
MODIFY THE EXISTING SCHEDULE**

Jeremy Firestone
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Pro Se

Intervenor Jeremy Firestone's files this Response to Staff's Request to Modify the Existing Schedule and states as follows.

1. Staff filed its second Motion to Compel on August 28, 2014. At the same time, Staff requested the existing schedule be modified given alleged discovery failures of the Joint Applicants. Exhibit E to the Staff's Motion is a proposed revised Scheduling Order.
2. Without taking a specific position on the Staff's Motion to Compel, I support the request to revise the existing scheduling order and support the revisions embodied in the aforementioned Exhibit E.
3. Given that follow-up discovery is required to be filed by tomorrow under the present schedule, I urge the Hearing Examiner to act on the request for a scheduling revision

early in the day Friday without prejudicing a final decision on the merits of Staff's Motion to Compel.

4. A modification is warranted given tight timeframes and the Joint Applicants cramped view of "discovery." Nowhere is this cramped view more apparent than in the Joint Applicants' refusal to produce to me (also subject to a separate Motion to Compel) a resume or CV of its pre-filed witnesses because their "qualifications and personal history ... is contained in their filed testimony." While the Joint Applicants' sanitized presentation of a person's qualifications may be adequate for the Joint Applicants, it is not for the Joint Applicants to decide what is adequate for the other Parties. Indeed, we are not here to simply witness Exelon's assumption of control; rather, we are here to engage in a searching inquiring into whether or not its proposed acquisition of Pepco/Delmarva is consistent with the public interest.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jeremy Firestone". The signature is fluid and cursive, with the first name "Jeremy" written in a larger, more prominent script than the last name "Firestone".

Jeremy Firestone
August 29, 2014

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CERTIFICATE OF SERVICE

I hereby certify that on August 27, 2014, that I caused **INTERVENOR JEREMY FIRESTONE'S RESPONSE TO STAFF'S REQUEST TO MODIFY THE EXISTING SCHEDULE** to be served on all parties on the email service list by email attachment.

Respectfully submitted,



Jeremy Firestone
29 August 2014